UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PFIZER INC. SECURITIES LITIGATION

No. 04-cv-9866 (LTS) (DFE)

DECLARATION OF GREGORY A. MARKEL IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE CERTAIN PLAINTIFFS' EXPERTS' OPINIONS REGARDING CELEBREX AND BEXTRA

GREGORY A. MARKEL, under penalty of perjury, declares as follows:

A. I am a member of the Bar of the State of New York and of the firm Cadwalader, Wickersham & Taft LLP, counsel for Defendants Pfizer Inc. (Pfizer), Dr. Henry A. McKinnell, Dr. John L. LaMattina, Karen L. Katen, Dr. Joseph M. Fezcko and Dr. Gail Cawkwell (collectively, "Defendants"). I submit this declaration in support of Defendants' Motion to Exclude Certain Plaintiffs' Experts' Opinions Regarding Celebrex and Bextra.

B. Attached hereto as Exhibits 1 – 161 are true and correct copies of the following documents:

1. Furberg, Curt D., Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, dated March 6, 2009.

2. Kronmal, Richard A., Expert Report in the action caption *In re Pfizer Inc. Securities Litigation*, 2009.

3. Bennett, Joel S., M.D., Deposition Transcript in the action captioned *In re Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation*, dated June 11-12, 2007.

4. Excerpts from Lawrence M. Friedman, Curt D. Furberg, and David L. DeMets, Fundamentals of Clinical Trials, 2 (3d ed. 1998).

5. Excerpts from Bengt D. Furberg & Curt D. Furberg, Evaluating Clinical Research: All That Glitters Is Not Gold, 11-12 (2d. ed. 2007).

6. Furberg, Curt D., Deposition Transcript in the action captioned *Valenzuela v. Warner-Lambert Co.*, dated July 31, 2002.

7. Furberg, Curt D., Deposition Transcript in the action captioned *Haslam v. Pfizer Inc.*, dated March 13-14, April 16, 2008.

8. Furberg, Curt D., Deposition Transcript in the action captioned *In re Pfizer Inc. Securities Litigation*, dated May 28-29, 2009, July 11, 2009.

9. Bennett, Joel S., Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, dated March 6, 2009.

10. Furberg & Morgan, *Lessons from overviews of cardiovascular trials.* STAT. MED. 1987;6:295-303.

11. Antiplatelet Trialist Collaboration, *Collaborative overview of randomised trials of antiplatelet therapy--I: Prevention of death, myocardial infarction, and stroke by prolonged antiplatelet therapy in various categories of patients. Antiplatelet Trialists' Collaboration.* BRIT. MED. J., 1994;308:81-106.

12. Kronmal, Richard A., Deposition Transcript in the action captioned *In re Pfizer Inc. Securities Litigation*, dated June 3-4, 2009.

13. Madigan, David, Deposition Transcript in the action captioned *In re Pfizer Inc. Securities Litigation*, dated June 11, 2009.

14. Furberg, Curt D., *Class effects and evidence-based medicine.* CLIN. CARDIOL. 2000;23;7 Suppl. 4:IV15-19.

15. Furberg, Curt D., *To whom do the research findings apply?* HEART 2002; 87:570-74.

16. Furberg, Curt D., et al., *Are drugs within a class interchangeable?* LANCET 1999;354:1202-04.

17. Furberg, POSTGRADUATE MEDICINE: A QUARTER-CENTURY OF BETA BLOCKADE (1988).

18. Jewell, Nicholas P., Deposition Transcript in the action captioned *In re Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation*, dated June 21-22, 2007.

19. Jewell, Nicholas P., Deposition Transcript in the action captioned *In re Pfizer Inc. Securities Litigation*, dated June 17, 2009.

20. Furberg et al., *Parecoxib, valdecoxib, and cardiovascular risk.* CIRCULATION 2005;111:249.

21. Celebrex Label, Dec. 2008.

22. Singh & Ramey, *NSAID Induced Gastrointestinal Complications: The ARAMIS Perspective – 1997.* J. RHEUM. 1998;25(Supp. 51):8-16.

23. Transcript of the Joint Meeting of the FDA Arthritis Advisory Committee and the Drug Safety and Risk Management Advisory Committee, dated Feb. 16-18, 2005.

24. Celebrex Initial Approved Label, January 5, 1999.

25. Excerpts from the Celecoxib Integrated Summary of Safety Information, dated June 5, 1998.

26. James Witter, *Celebrex Medical Officer Review*, NDA No. 20-998, dated July 8, 1998.

27. Bombardier et al., *Comparison of upper gastrointestinal toxicity of rofecoxib and naproxen in patients with rheumatoid arthritis,* N ENGL. J. MED., 2000;343:1520-28.

28. Pfizer Inc.'s Advisory Committee Briefing Document: *Celecoxib and Valdecoxib Cardiovascular Safety*, dated January 12, 2005.

29. Bresalier et al., *Cardiovascular events associated with rofecoxib in a colorectal adenoma chemoprevention trial.* N. ENGL. J. MED. 2005;352-63.

30. Celebrex Label, dated June 2002.

31. Vioxx Label, dated April 2002.

32. Graham, David J., Memorandum to Paul Seligman, "Risk of Acute Myocardial Infarction and Sudden Cardiac Death in Patients Treated With COX-2 Selective and Non-Selective NSAIDs, dated Sept. 30, 2004.

33. Graham, David J., et al., *Risk of acute myocardial infarction and sudden cardiac death in patients treated with cyclo-oxygenase 2 selective and non-selective non-steroidal anti-inflammatory drugs: nested case-control study.* LANCET 2005;365:475-81.

34. Hippisley-Cox et al., *Risk of myocardial infarction in patients taking cyclo-oxygenase-2 inhibitors or conventional non-steroidal anti-inflammatory drugs: population based nested case-control analysis.* BRIT. MED. J., 2005;330:1366-1372.

35. Mamdani et al., *Effect of selective cyclooxygenase 2 inhibitors and naproxen on short-term risk of acute myocardial infarction in the elderly.* ARCH. INTERN. MED. 2003;163:481-86.

36. Mamdani et al., *Cyclo-oxygenase-2 inhibitors versus non-selective non-steroidal anti-inflammatory drugs and congestive heart failure outcomes in elderly patients: a population-based cohort study.* LANCET 2004;363:1751-1756.

37. Ray et al., *COX-2 selective non-steroidal anti-inflammatory drugs and risk of serious coronary heart disease.* LANCET 2002;360:1071-73.

38. Solomon D. et al., *Relationship between selective cyclooxygenase-2 inhibitors and acute myocardial infarction in older adults.* CIRCULATION 2004;109:2068-73.

39. Sowers et al., *The Effects of cyclooxygenase-2 inhibitors and nonsteroidal anti-inflammatory therapy on 24-hour blood pressure in patients with hypertension, osteoarthritis, and type 2 diabetes mellitus.* ARCH. INTERN. MED. 2005;165:161-168.

40. Whelton et al., *Cyclooxygenase-2--specific inhibitors and cardiorenal function: a randomized, controlled trial of celecoxib and rofecoxib in older hypertensive osteoarthritis patients.* AM. J. THER. 2001;8:85-95 Erratum in: Am J Ther 2001 May-Jun;8(3):220.

41. Whelton et al., *Effects of celecoxib and rofecoxib on blood pressure and edema in patients ≥65 years of age with systemic hypertension and osteoarthritis.* AM. J. CARDIOL. 2002;90:959-963.

42. Hudson et al., *Differences in outcomes of patients with congestive heart failure prescribed celecoxib, rofecoxib, or non-steroidal anti-inflammatory drugs: population based study.* BRIT. MED. J. 2005;330:1370-1375.

43. Solomon D. et al., *Relationship between COX-2 specific inhibitors and hypertension.* HYPERTENSION 2004;44:140-145.

44. Wolfe et al., *Blood Pressure Destabilization and Edema Among 8538 Users of Celecoxib, Rofecoxib and Non-Selective Non-Steroidal Anti-Inflammatory Drugs (NSAID) and Non-Users of NSAID Receiving Ordinary Clinical Care,* J. RHEUMATOL. 2004;31:1143-1151.

45. Walter et al., *Sulfone COX-2 inhibitors increase susceptibility of human LDL and plasma to oxidative modification: comparison to sulfonamide COX-2 inhibitors and NSAIDs.* ATHEROSCLEROSIS 2004:177:235-243.

46. Steffel et al., *Celecoxib decreases endothelial tissue factor expression through inhibition of c-Jun terminal NH2 kinase phosphorylation.* CIRCULATION 2005;111:1685-1689.

47. Hermann et al., *Differential effects of selective cyclooxygenase-2 inhibitors on endothelial function in salt-induced hypertension.* CIRCULATION 2003;108:2308-11.

48. Klein et al., *Celecoxib dilates guinea-pig coronaries and rat aortic rings and amplifies NO/cGMP signaling by PDE5 inhibition.* CARDIOVASC. RES. 2007;75:390-97.

49. Solomon S. et al., *Cardiovascular Risk Associated with Celecoxib in a Clinical Trial for Colorectal Adenoma Prevention,* N. ENGL. J. MED. 2005;352:1071-80.

50. FDA Statement on the Halting of a Clinical Trial of the Cox-2 Inhibitor Celebrex, dated Dec. 17, 2004.

51. Memo from Monica Bertagnolli to Pfizer re: APC Trial Cardiovascular Safety Review, Oct. 15, 2004.

52. National Institutes of Health Press Release, *Use of Non-Steroidal Anti-Inflammatory Drugs Suspended in Large Alzheimer's Disease Prevention Trial*, dated Dec. 20, 2004.

53. Arber et al., *Celecoxib for the Prevention of Colorectal Adenomatous Polyps,* N. ENGL. J. MED. 2006;355:885-95.

54. ADAPT Research Group, *Cardiovascular and Cerebrovascular Events in the Randomized, Controlled Alzheimer's Disease Anti-Inflammatory Prevention Trial*, PLOS CLIN TRIALS 2006;1(7): e33.

55. Jenkins, John K. & Paul J. Seligman, *Analysis and Recommendations for Agency Action Regarding Non-Steroidal Anti-Inflammatory Drugs and Cardiovascular Risk*, dated Apr. 6, 2005.

56. Excerpts from Bennett, Joel *Acquired Qualitative Platelet Disorders,* WILLIAMS HEMATOLOGY (7th ed., 2007) .

57. Minutes of the Feb. 16-18, 2005 Joint Meeting of the FDA Arthritis Advisory Committee and the Drug Safety and Risk Management Advisory Committee.

58. Witter, Dr. James, Presentation entitled *COX-2 CV Safety Celecoxib*, dated Feb. 16, 2005.

59. Graham, Dr. David, Office of Drug Safety, Center for Drug Evaluation and Research, Presentation entitled *Review of Epidemiologic Studies on Cardiovascular Risk With Selected NSAIDs*, dated Feb. 17, 2005.

60. Kearney et al., *Do selective cyclo-oxygenase-2 inhibitors and traditional non-steroidal anti-inflammatory drugs increase the risk of atherothrombosis? Meta-analysis of randomised trials*, BRIT. MED. J. 2006; 332:1302-1308, *additional materials available at* http://www.bmj.com, (last visited March 31, 2008)

61. Baruch, Lawrence, Expert Report in the action captioned *In re Pfizer inc. Securities Litigation*, dated May 19, 2009.

62. Folsom et al., *Coronary artery calcification compared with carotid intima-media thickness in the prediction of cardiovascular disease incidence: the Multi-Ethnic Study of Atherosclerosis (MESA).* Arch. Intern. Med. 2008;168:1333-1339.

63. Smith et al., *Fasting and 2-hour postchallenge serum glucose measures and risk of incident cardiovascular events in the elderly: the Cardiovascular Health Study.* Arch. Intern. Med. 2002;162(2):209-216.

64. Soininen at al., *Long-Term Efficacy and Safety of Celecoxib in Alzheimer's Disease.* DEMENT. GERIATR. COGN. 2007;23:8-21.

65. Letter from the Securities and Exchange Commission to Ethan Posner, dated Aug. 16, 2006.

66. Weintraub, William, M.D., Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, dated April 17, 2009.

67. Transcript of Proceedings, dated October 9, 2007, in the action captioned *In re Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation.*

68. Kronmal, Richard A. Ph.D., Excerpts of Deposition Transcript in the action captioned *McFarland v. Merck & Co., Inc.*, dated June 7, 2006.

69. Solomon S. et al., *Cardiovascular Risk of Celecoxib in 6 Randomized Placebo-Controlled Trials* CIRCULATION 2008;117: 2104-2113.

70. Cleveland Clinic Launches Large-Scale Global Trial to Examine Cardiovascular Safety of Popular Pain Relievers, dated December 13, 2005.

71. Furberg, Curt D., Expert Report in the action captioned *In re Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation*, dated January 24, 2008.

72. Furberg, Curt D., Deposition Transcript in the action captioned *In re Rezulin Products Liability Litigation*, dated November 22, 2002.

73. Antman et al., *Use of Nonsteroidal Antiinflammatory Drugs. An Update for Clinicians. A Scientific Statement From the American Heart Association.* CIRCULATION 2007;115:1634-42.

74. McGettigan et al., *Cardiovascular Risk and Inhibition of Cyclooxygenase* JAMA 2006; 296:1633-44.

75. Celebrex Label, dated Dec. 2006.

76. Letter from Peter East of Pharmacia to Jonca Bull of the FDA, dated January 15, 2001, regarding the valdecoxib NDA.

77. Excerpts from the Valdecoxib Integrated Summary of Safety, dated December 2000.

78. Letter from Jonca Bull of the FDA to Peter East of G.D. Searle & Co. re: approval for Bextra, dated Nov. 16, 2001.

79. Dear Healthcare Professional Letter, dated Sept. 2002, regarding Bextra.

80. Parecoxib sodium New Drug Application letter from Peter East to Jonca Bull, dated Sept. 11, 2000.

81. FDA Non-Approvable Letter from Jonca Bull to Peter East for parecoxib sodium, dated July 12, 2001.

82. Ott et al., *Efficacy and Safety of the Cyclooxygenase-2 Inhibitors Parecoxib and Valdecoxib in Patients Undergoing Coronary Artery Bypass Surgery.* J. THORAC. CARDIOVASC. SURG. 2003; 125:1481-92.

83. Witter, Dr. James, Presentation entitled *COX-2 CV Safety Valdecoxib/Parecoxib,* dated Feb. 16, 2005.

84. Johnson, Kent, Valdecoxib Medical Officer Review, dated November 7, 2001.

85. Letter From Peter East of Pharmacia to Jonca Bull of FDA regarding valdecoxib NDA, dated Oct. 17, 2001.

86. Email from Peter East to numerous recipients enclosing summary of Oct. 24, 2001 teleconference with FDA.

87. Nussmeier et al., *Complications of the COX-2 Inhibitors Parecoxib and Valdecoxib After Cardiac Surgery.* N. ENGL. J. MED. 2005; 352:1081-91.

88. Excerpts from the Final Study Report for the CABG-2 Study, dated June 7, 2004 [Tables 20, 21 and 23].

89. Mar. 17, 2004 Submission to FDA, Pare IND 52613 00000473, 00000482.

90. Nussmeier et al., *Safety and Efficacy of Cyclooxygenase-2 Inhibitors Parecoxib and Valdecoxib after Noncardiac Surgery.* ANESTHESIOLOGY 2006;104:518-28.

91. Solomon D. et al., *Cardiovascular Outcomes in New Users of Coxibs and Nonsteroidal Antiinflammatory Drugs: High Risk Subgroups and Time Course of Risk.* ARTHR. RHEUM. 2006; 54:1378-89.

92. Singh et al., *Celecoxib Versus Naproxen and Diclofenac in Osteoarthritis Patients: SUCCESS-I Study.* AM. J. MED. 2006;119:255-66.

93. Chen et al., *Do selective COX-2 inhibitors increase the risk of cerebrovascular events? A meta-analysis of randomized controlled trials.* J. CLIN. PHARM. THER. 2006; 31:565-76.

94. Chen et al., *Risk of myocardial infarction associated with selective COX-2 inhibitors: Meta-analysis of randomised conrolled trials.* PHARMACOEPIDEMIOL. DRUG SAF. 2007; 16:762-72.

95. Edwards et al., *Efficacy and Safety of Valdecoxib for Treatment of Osteoarthritis and Rheumatoid Arthritis: Systematic Review of Randomised Controlled Trials.* PAIN 2004; 111:286-96: Supplementary data located at doi:10.1016/j.pain.2004.07.004.

96. White et al., *Effects of the Cyclooxygenase-2 Specific Inhibitor Valdecoxib Versus Non-steroidal Anti-Inflammatory Agents and Placebo on Cardiovascular Thrombotic Events in Patients With Arthritis.* AM. J. THER. 2004; 11:244-50.

97. Madigan, David, Ph.D., *Celebrex and Cardiovascular Risk*, Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, dated March 12, 2009.

98. Madigan, David Ph.D., Expert Report in the action captioned *Grutka v. Pfizer Inc.*, dated August 22, 2008.

99. Madigan, David Ph.D., Deposition Transcript in the action captioned *Grutka v. Pfizer* Inc., dated September 3-4, 2008.

100. Madigan, David Ph.D., *Vioxx and Cardiovascular Risk*, Expert Report, dated October 8, 2007.

101. Sever, et al., *Prevention of coronary and stroke events with atorvastatin in hypertensive patients who have average or lower-than-average cholesterol concentrations, in the Anglo-Scandinavian Cardiac Outcomes Trial--Lipid Lowering Arm (ASCOT-LLA): a multicentre randomised controlled trial.* LANCET 2003;361:1149-1158.

102. Jewell, Nicholas P., Rebuttal Expert Report, *In re Pfizer Inc. Securities Litigation*, dated April 17, 2009.

103. Letter from Geoffrey C. Jarvis to Gregory A. Markel and Jason M. Halper, dated July 6, 2009, including exhibits.

104. Furberg, Curt D., Deposition Transcript in the action captioned *Rushton v. Bayer Corporation* (Baycol), dated December 23, 2003.

105. Furberg, Curt D., Deposition Transcript in the action captioned *Sturgill v. Johnson & Johnson Company* (Propulsid), dated October 29, 2002.

106. Pollack, Andrew *The Minimal Impact of a Big Hypertension Study*, N.Y. TIMES, dated Nov. 27, 2008.

107. Zosia Chustecka, *Experts Condemn Furberg's Meta-Analysis Showing Calcium Channel Markelers to be Inferior*, HEARTWIRE, Sept. 1, 2000.

108. Ochs, Ridgely *A High-Tension Drug Study/Channel Markeler Research Prompts Clash Between Company, Scientists,* NEWSDAY (NY), dated Oct. 22, 1996.

109. Kaplan, Norman M., *Do calcium antagonists cause cancer?* LANCET 1996;348:541-42.

110. *Calcium Channel Markeler Debate Continues,* MARKETLETTER, Sept. 11, 1995.

111. Furberg, Curt D., Expert Report in the action captioned *In re Gadolinium-based Contrast Agents Liability Litigation*, dated June 11, 2009.

112. Furberg, Curt D., Expert Witness Declaration (Baycol), dated July 30, 2003.

113. Furberg, Curt D., Expert Report in the action captioned *In re Neurontin Sales Marketing and Products Liability Litigation*, dated December 11, 2008.

114. Furberg, Curt D., Expert Witness Declaration in the action captioned *In re Rezulin Products Liability Litigation*, dated August 23, 2002.

115. Harris, Gardiner *New Study Links Pfizer's Bextra, Similar to Vioxx, to Heart Attacks*, N.Y. TIMES, Nov. 10, 2004.

116. Alonso-Zaldivar, Ricardo *FDA to Institute Safety Board*, L.A. TIMES, Feb. 16, 2005.

117. Rubin, Rita *Painkillers Hang in the Balance*, USA TODAY, Feb. 10, 2005.

118. Mundell, E.J. *Bextra Data Suggests All Cox-2 Drugs Pose Heart Risks*, HEALTH DAY, Jan. 18, 2005.

119. Henderson, Diedtra *Calls Are Mounting for Revamp of FDA*, BOSTON GLOBE, Dec. 25, 2004.

120. Fax from Paul Z. Balcer, Regulatory Health Project Manager to Kevin Phelan of Pfizer, dated March 3, 2005.

121. Email from Curt Furberg to Brian Harvey, dated Aug. 17, 2005, attaching letter from Curt Furberg to Brian Harvey, Acting Director of CDER's Division of Anti-Inflammatory, Analgesic, and Ophthalmic Drug Products, dated June 17, 2005.

122. Letter from Curt Furberg to Bob Rappaport, Director of CDER's Division of Anti-Inflammatory, Analgesic, and Ophthalmic Drug Products, dated Sept. 27, 2005.

123. Rita Rubin, *Another Drug for Pain off Market; Risk vs. Benefit for Bextra Cited*, USA TODAY, Apr., 8, 2005.

124. Furberg & Pitt, *Are all angiotensin-converting enzyme inhibitors interchangeable?* J. AM. COLL. CARDIOL. 2001;37:1456-60.

125. Yusuf et al., *Intravenous and intracoronary fibrinolytic therapy in acute myocardial infarction: Overview of results on mortality, reinfarction and side-effects from 33 randomized controlled trials.* EUR. HEART J. 1985;6:556-85.

126. Alderman et al., *Hypertension guidelines: criteria that might make them more clinically useful.* AM. J. HYPERTEN. 2002;15:917-23.

127. Sellke, Frank W. M.D., Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, dated April 16, 2009.

128. Massie, Barry M. M.D., Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, April 17, 2009.

129. Heckbert et al., *Beta2-adrenergic receptor polymorphisms and risk of incident cardiovascular events in the elderly.* CIRCULATION. 2003;107:2021-24.

130. Excerpts from MAYO CLINIC CARDIOLOGY: CONCISE TEXTBOOK (3d ed., 2007); Jahangir et al., *Principles of Pharmacokinetics and Pharmacodynamics*; and Ou et al., *Cardiac Drug Adverse Effects and Interactions*.

131. Bennett et al., *The use of nonsteroidal anti-inflammatory drugs (NSAIDs): a science advisory from the American Heart Association.* CIRCULATION 2005;111:1713-16.

132. Jewell, Nicholas P., Expert report in the action caption *In re Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation,* dated February 4, 2008.

133. Wei, Lee-Jen, Expert Report in the action captioned *In re Pfizer Inc. Securities Litigation*, dated April 17, 2009.

134. Solomon S. et al., *Effect of Celecoxib on Cardiovascular Events and Blood Pressure in Two Trials for the Prevention of Colorectal Adenomas,* CIRCULATION 2006;114;1028-1035.

135. Gould et al., *Cholesterol reduction yields clinical benefit. A new look at old data.* CIRCULATION 1995;91:2274-82

136. Rubins et al., *Gemfibrozil for the secondary prevention of coronary heart disease in men with low levels of high-density lipoprotein cholesterol.* N. ENGL. J. MED. 1999;341:410-8.

137. Furberg et al., *Nifedipine. Dose-related increase in mortality in patients with coronary heart disease.* CIRCULATION 1995;92:1326-31.

138. Opie & Messerli, *Nifedipine and mortality. Grave defects in the dossier.* CIRCULATION 1995;92:1068-73.

139. Kloner, *Nifedipine in ischemic heart disease.* CIRCULATION 1995;92:1074-8.

140. Rafflenbeul et al., *Nifedipine in acute coronary syndromes: Furberg's refrain revisited.* EUR HEART J 1996;17:1147-52.

141. Poole-Wilson et al., *Effect of long-acting nifedipine on mortality and cardiovascular morbidity in patients with stable angina requiring treatment (ACTION trial): randomised controlled trial.* LANCET 2004;364:849-57.

142. Pahor et al., *Risk of gastrointestinal haemorrhage with calcium antagonists in hypertensive persons over 67 years old.* LANCET 1996;347:1061-5.

143. Fitzpatrick et al., *Use of calcium channel blockers and breast carcinoma risk in postmenopausal women.* CANCER 1997;80:1438-47.

144. Pahor & Furberg, *Is the use of some calcium antagonists linked to cancer? Evidence from recent observational studies.* DRUGS AGING 1998;13:99-108.

145. Leenen et al., *Clinical events in high-risk hypertensive patients randomly assigned to calcium channel blocker versus angiotensin-converting enzyme inhibitor in the antihypertensive and lipid-lowering treatment to prevent heart attack trial.* HYPERTENSION 2006;48:374-84.

146. Heckbert et al., *The association of antihypertensive agents with MRI white matter findings and with Modified Mini-Mental State Examination in older adults* J. AM. GERIATR . SOC. 1997;45:1423-33.

147. Steven Milloy, Junk Science: Diabetes Drug Scare or Scam? FOXNews.com, June 10, 2007, available at http://www.foxnews.com/story/0,2933,279079,00.html (last visited July 8, 2009).

148. Forette et al., *The prevention of dementia with antihypertensive treatment: new evidence from the Systolic Hypertension in Europe (Syst-Eur) study.* ARCH. INTERN. MED. 2002;162:2046-52.

149. Pahor et al., *Health outcomes associated with calcium antagonists compared with other first-line antihypertensive therapies: a meta-analysis of randomised controlled trials.* LANCET 2000;356:1949-54.

150. Kaplan, Norman M. *Another scare about antihypertensive therapy.* LANCET 2000;356:1933.

151. Middeke, M. *The "Furberg bias" or: The Manipulation of evidence-based medicine,* J. DTSCH. MED. WOCHENSCHR. 2001;126:151-2.

152. ALLHAT Officers and Coordinators for the ALLHAT Collaborative Research Group, *Major Outcomes in High-Risk Hypertensive Patients Randomized to Angiotensin-Converting Enzyme Inhibitor or Calcium Channel Blocker vs Diuretic.* JAMA 2002;288:2981-97.

153. Singh et al., *Inhaled Anticholinergics and Risk of Major Adverse Cardiovascular Events in Patients With Chronic Obstructive Pulmonary Disease.* JAMA 2008;300:1439-50.

154. Smith, Michael, FDA Eases Stroke Concerns for Tiotropium in COPD Therapy, MedPage Today, Oct. 7, 2008.

155. Tashkin et al., *A 4-year trial of tiotropium in chronic obstructive pulmonary disease.* N. ENGL. J. MED. 2008;359:1543-54 Epub 2008 Oct 5.

156. Singh et al., *Long-term risk of cardiovascular events with rosiglitazone: a meta-analysis.* JAMA 2007;298:1189-95.

157. Avandia Label, dated October 2008.

158. Home et al., *Rosiglitazone evaluated for cardiovascular outcomes in oral agent combination therapy for type 2 diabetes (RECORD): a multicentre, randomised, open-label trial.* LANCET 2009;373:2125-35. Epub 2009 Jun 6.

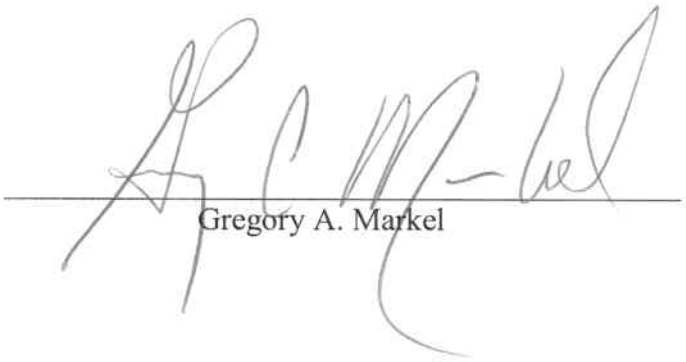
159. Home et al., *Rosiglitazone evaluated for cardiovascular outcomes--an interim analysis.* N. ENGL. J. MED. 2007;357:28-38 Epub 2007 Jun 5.

160. Lincoff et al., *Pioglitazone and risk of cardiovascular events in patients with type 2 diabetes mellitus: a meta-analysis of randomized trials.* JAMA 2007;298:1180-8.

161. Baruch, Lawrence, M.D., Deposition Transcript in the action captioned *In re Pfizer Inc. Securities Litigation*, dated July 2, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 17, 2009



Gregory A. Markel

DUE TO THE VOLUMINOUS NATURE OF THE EXHIBITS ATTACHED TO THE MARKEL DECLARATION, DEFENDANTS REQUESTED AND RECEIVED PERMISSION FROM THE COURT TO FILE THESE EXHIBITS IN HARD COPY RATHER THAN VIA ECF. CERTAIN OF THESE EXHIBITS WILL BE FILED UNDER SEAL.